

WPCA
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APPLETON, WI 54915

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Office of the Secretary
Federal Communications Commission
1919 M. Street, N.W.
Room 222
Washington, D.C. 20554

Re: Pay Telephone Rulemaking
CC Docket No. 96-128
FCC No. 96-254
Comments of the Wisconsin Public Communications Assoc.

Dear Sir/Madam

Enclosed for filing please find the original and 14 copies of the Comments of the Wisconsin Public Communications Association in the above-referenced matter. Also enclosed is a floppy diskette with the comments provided in WP for Windows 5.1 (REPLYCOM).

Thank you for your assistance in this matter.

Sincerely



Roger B. Skrypczak
President

Enclosures

cc: Common Carrier Bureau
w/2 copies of enclosure
and 1 floppy diskette

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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington D.C. 20554

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In the Matter of
Implementation of the
Pay Telephone Reclassification and
Compensation Provisions of the
Telecommunications Act of 1996

CC Docket No. 96-128
FCC No. 96-254

REPLY COMMENTS OF THE WISCONSIN PUBLIC COMMUNICATIONS ASSC.

I. INTRODUCTION

The Wisconsin Public Communications Association (WPCA) respectfully submits its comments in response to earlier comments filed in response to the Commission's Notice of Proposed Rulemaking, FCC 96-25, released June 6, 1996 in the above captioned docket (the "Notice").

The WPCA is a not for profit organization which represents Independent Payphone Providers (IPPs) who operate pay telephones in Wisconsin and their suppliers of products and services in matters of legislation, regulation and education concerning public communications.

The WPCA strongly supports the Michigan Pay Telephone Assc. (MPTA) in its comments concerning a National Coin Rate and concurs with the following:

FEDERAL COMMUNICATION COMMISSION

Filed July 12, 1996

CC Docket No. 96-128

FCC No. 96-254

Comments of the Wisconsin Public Communication Association

A. Section 276 of The Act did not contemplate or authorize a nationwide coin rate.

B. A nationwide coin rate would ignore the variation of costs of local calls throughout the country.

C. A nationwide coin rate would conflict with the intent of the Act to end subsidization of payphones by LECs.

D. A nationwide coin rate would allow LECs to exert a price squeeze on independent PSPs.

E. The better policy is to let the Market set the price of local calls.

Additionally, the WPCA is concerned that a nationwide coin rate would prove to add regulatory hinderance to the market rather than cause a reduction which should be its purpose.

RESPECTFULLY SUBMITTED,

WISCONSIN PUBLIC COMMUNICATIONS

BY 

Roger B. Skrypczak, its President
for the Board of Directors
W6246 Cty Trk BB, Suite B
Appleton, WI 54915

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